

1 Morgan Chu (SBN 70446)
Benjamin W. Hattenbach (SBN 186455)
2 Amy E. Proctor (SBN 283845)
Dominik Slusarczyk (SBN 287084)
3 Charlotte J. Wen (SBN 313572)
IRELL & MANELLA LLP
4 1800 Avenue of the Stars, Suite 900
Los Angeles, California 90067
5 Telephone: (310) 277-1010
Facsimile: (310) 203-7199
6 Email: mchu@irell.com
Email: bhattenbach@irell.com
7 Email: aproctor@irell.com
Email: dslusarczyk@irell.com
8 Email: cwen@irell.com

9 *Counsel for Plaintiff*
VLSI TECHNOLOGY LLC

12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN JOSE DIVISION**

15 VLSI TECHNOLOGY LLC,
16
17 Plaintiff,
18 v.
19 INTEL CORPORATION,
20 Defendant.

Case No. 5:17-cv-05671-BLF (NC)

**[PROPOSED] ORDER GRANTING
VLSI'S MOTION TO COMPEL
DEFENDANT INTEL CORPORATION
TO PROVIDE DISCOVERY ON
ADDITIONAL PRODUCTS**

Judge: Hon. Nathanael M. Cousins

At the October 24, 2018 discovery hearing, the Court began to hear from the parties on Letter Brief 164 (addressing VLSI's preliminary infringement contentions and Intel's production of technical documents) but argument on the motion was not completed. The Court concluded it did not have enough time or information to decide this dispute, and suggested that the parties agree to refer it to a special master. Since that time, the parties jointly agreed to defer this dispute for resolution by a special master as suggested by the Court, D.I. 176, and jointly requested that the Court vacate the hearing set for November 14, 2018, *id.* VLSI therefore did not anticipate that the parties would file additional proposed orders purporting to adjudicate the merits of the motion. Nonetheless, because Intel chose to submit such a proposed order this evening, out of an excess of caution VLSI hereby submits a corresponding proposed order granting its motion to compel.

Dated: November 7, 2018

Respectfully submitted,

By: /s/ Charlotte J. Wen

Charlotte J. Wen

IRELL & MANELLA LLP
 Morgan Chu (SBN 70446)
 Benjamin W. Hattenbach (SBN 186455)
 Amy E. Proctor (SBN 283845)
 Dominik Slusarczyk (SBN 287084)
 Charlotte J. Wen (SBN 313572)
 1800 Avenue of the Stars, Suite 900
 Los Angeles, California 90067-4276
 Telephone: (310) 277-1010
 Facsimile: (310) 203-7199
 Email: mchu@irell.com
 Email: bhattenbach@irell.com
 Email: aproctor@irell.com
 Email: dslusarczyk@irell.com
 Email: cwen@irell.com

Counsel for Plaintiff
 VLSI TECHNOLOGY LLC